

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re:

Chapter 13

James M. Reich and
Rebecca G. Reich,

Case No. 09-25806-SVK

Debtors.

**STIPULATION REGARDING MOTION OF UNIVERSAL MORTGAGE CORPORATION
FOR RELIEF FROM THE AUTOMATIC STAY**

The debtors, by their attorneys, Legal Helpers, PC, and Universal Mortgage Corporation, its successors and/or assignees (hereinafter “the movant”), by its attorneys, Gray & Associates, L.L.P., stipulate and agree as follows:

1. The movant holds a promissory note and a mortgage encumbering the debtors' real property located at N4846 Hillcrest Drive, Bonduel, WI. The debtors has failed to make monthly mortgage payments required by said note and mortgage in a timely manner. Said default in payments has caused the movant to file a motion for relief from the automatic stay herein dated March 15, 2010. The post-petition arrearage at that time was \$7,421.76.

2. That the debtors shall pay the sum of \$7,421.78 to the movant in sufficient time to be received on or before April 30, 2010. In the event this sum is not received in a timely manner, counsel for the movant may submit an affidavit of default and proposed order for immediate

Drafted by:

Mark A. Clauss
Gray & Associates, L.L.P.
16345 West Glendale Drive
New Berlin, WI 53151
Phone: 414.224.8404
Fax: (414) 224-1279
Email: mclauss@gray-law.com

Gray & Associates, L.L.P. is attempting to collect a debt on its client's behalf and any information it obtains will be used for that purpose. If you previously received a discharge in a chapter 7 bankruptcy case, this should not be construed as an attempt to hold you personally liable for the debt.

relief from the automatic stay to the court for signature.

3. That with the expectation that the payment required by the preceding paragraph will be received in a timely manner, the movant may file a supplemental claim for the remaining post-petition arrearage which exists through the end of April 2010 in the amount of \$1,326.42, which is itemized as follows:

11/09-3/10 payment(s)	5 @	1,286.00	\$6,430.00
4/10 payment(s)	1 @	1,261.00	1,261.00
Attorney fees/costs			800.00
Accrued late fees			257.20
Payment received 4/30/10			(7,421.78)
TOTAL ARREARAGE			<u>\$1,326.42</u>

4. That the debtors shall voluntarily increase the plan payments to the trustee as necessary to pay the supplemental claim and ensure that the plan is adequately funded and remains feasible.

5. That commencing in May 2010 and continuing through and including October 2010, the debtors shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the sixteenth (16th) day of each month in which each such payment is due. In the event any payment is not received by the movant in a timely manner, counsel for the movant may submit an affidavit of default and proposed order for immediate relief from the automatic stay to the court for signature.

6. That commencing in November 2010, the debtors shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the sixteenth (16th) day of each month in which each such payment is due. In the event any payment is not received by the movant in a timely manner, counsel for the movant may request by letter another hearing upon the motion for relief from the automatic stay.

7. That pending further notice, the amount of the monthly mortgage payment is \$1,261.00 and payments shall be made to the movant at Universal Mortgage Corporation, Attn:

Bankruptcy Department, 12080 North Corporate Parkway, Mequon, WI 53092.

8. That the court approve the terms of this stipulation and make them an order of the court.

Dated this 11th day of May, 2010.

LEGAL HELPERS, PC
Attorneys for Debtors

By: /s/ William Murphy
William Murphy

Dated this 13th day of April, 2010.

GRAY & ASSOCIATES, L.L.P.
Attorneys for Movant

By: /s/ Mark A. Clauss
Mark A. Clauss

NO OBJECTION

Dated this 18th day of April, 2010.

/s/ Thomas J. King
Thomas J. King
Chapter 13 Trustee